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9	UNITED STATES DISTRICT COURT		
10	DISTRICT OF NEVADA		
11	LINDA LEE SIPPLE, ON BEHALF OF	Case No. 2:21-cv-00904-GMN-NJK	
12	HERSELF AND ALL OTHERS SIMILARLY SITUATED		
13	Plaintiff,	ORDER TO	
14 15	v.	EXTEND THE TIME FOR DEFENDANT ZIONS BANCORPORATION, N.A. TO RESPOND TO THE COMPLAINT	
16	ZIONS BANCORPORATION, N.A.,	[SECOND REQUEST]	
17	Defendant.		
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19	Plaintiff Linda Lee Sipple ("Sipple") and defendant Zions Bancorporation, N.A. ("Zions"), by		
20	and through their undersigned attorneys, hereby stipulate and agree as follows:		
21	1. Plaintiff filed a putative class action Complaint against Zions in the Eighth Judicial		
22	District Court for the State of Nevada in the above-captioned action on February 17, 2021.		
23	2. Plaintiff served the Complaint on Zions on April 8, 2021.		
24	3. On May 7, 2021, Zions removed the	ne matter to this Court pursuant to 28 U.S.C. § 1441	
25	and 28 U.S.C. § 1332(d).		
26	4. Pursuant to Fed. R. Civ. P. 81(c)(2)), the deadline for Zions to respond to the Complaint	
27	was May 14, 2021.		
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- 5. On May 17, 2021, the Court granted the parties' Stipulation and Order to Extend the Time for Defendant to Respond to the Complaint [First Request], thereby extending the response date to June 7, 2021.
- 6. On May 28, 2021, Sipple advised that she may seek to remand this matter. On June 2, 2021, the parties met and conferred, but did not resolve the dispute, and Sipple intends to file her remand motion no later than June 7, 2021.
- 7. Based on this stated intention, the parties submitted a Stipulation and Order to Extend the Time for Defendant to Respond to the Complaint [Second Request] [Doc. 8] on June 3, 2021, requesting the Court extend the response deadline until twenty-one (21) days after the Court enters an order on the remand motion.
- 8. The Court denied the stipulation [Doc. 9], noting (a) that it was uncertain if Sipple would seek remand and (b) that the parties did not explain how the stipulation would conserve judicial resources by effectively staying discovery for an unknown period of time.
- 9. Regarding the Court's initial concern, on June 4, 2021, Sipple confirmed she would be filing her motion for remand by midnight the same day. As such, Sipple has stated that she will file a motion for remand and the uncertainty identified by the Court has been removed.
- 10. As to the Court's second concern, the point is well taken. The parties contend that proceeding immediately with discovery in this case will force the expenditure of unnecessary party resources that can better be devoted to other potential avenues for the resolution of this matter, including preliminary settlement discussions that will continue and likely be influenced by the substance of the remand motion as well as the Court's order regarding said motion.
- 11. That being said, the parties respect the Court's view of an unlimited extension. As such, the parties have further conferred and agreed to extend the deadline for Zions to respond to the Complaint by thirty (30) days from June 7, 2021 up to and including July 7, 2021.
- 12. Good cause supports the request because the parties will have an opportunity to evaluate the merits of Sipple's remand motion, explore any impact on the potential for further settlement discussions, and prepare an appropriate response to the pending Complaint.

1	13. The parties have previously requested one extension of the deadline to respond to t	
2	Complaint by this Court. No other requests have been made regarding any other deadlines.	
3	14. The parties enter into this stipulation in good faith and not for the purpose of delay.	
4	THEREFORE, and for good cause shown, the parties respectfully request that the deadline for	
5	Zions to file a response to the Complaint be extended up to and including July 7, 2021.	
6	IT IS SO STIPULATED.	
7	DATED this 4 th day of June, 2021.	DATED this 4 th day of June, 2021.
8	GREENBERG TRAURIG, LLP	LAW OFFICES OF BURAK S. AHMED, PC
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11	/s/ Jacob D. Bundick JACOB D. BUNDICK, ESQ.	/s/ Burak S. Ahmed BURAK S. AHMED, ESQ.
12	Nevada Bar No. 9772	Nevada Bar No. 12547 3651 Lindell Road, Suite D812
13	MICHAEL R. HOGUE, ESQ. Nevada Bar No. 12400 10845 Griffith Peak Drive, Ste. 600 Las Vegas, Nevada 89135 Attorneys for Defendant Zions Bancorporation, N.A.	Las Vegas, Nevada 89103
14		Attorneys for Plaintiff Linda Lee Sipple
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16 17		ODDED
	IT IC CO ODDEDED	ORDER
18	IT IS SO ORDERED:	
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21		HONORABLE NANCY J. KOPPE
22		UNITED STATES MAGISTRATE JUDGE DATED: June 7, 2021
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